allowable.

At page 1 of the Final Office Action, the Examiner rejects claims 1-4, 6-7, 20-28 under 35 U.S.C. §102(b) as being anticipated by Adams et al. (U.S. Patent No. 5,698,016). In this Office Action, the Examiner asserts that Adams et al. discloses a modified pigment, such as a carbon black having attached at least one organic group and at least one amphiphilic counterion, which can have a charge opposite to that of the organic ionic group. Moreover, the Examiner asserts that the organic group attached to the carbon can be at least one aromatic group or $C_1$-$C_{12}$ alkyl group. Thus, the Examiner concludes that the claimed invention is anticipated by Adams et al. For the following reasons, this rejection is respectfully traversed.

As recited in claim 1, the modified pigment of the claimed invention includes a pigment having attached at least one steric group, and having attached at least one organic ionic group, and at least one amphiphilic counterion, wherein the amphiphilic counterion has a charge opposite to that of the organic ionic group. As discussed in the specification of the claimed invention at page 5, with respect to at least one steric group, any group that has the ability to be steric or promote steric hindrance can be attached onto the pigment. This includes both organic and inorganic groups that have the ability to be steric or are capable of promoting steric hindrance. The specification, at pages 5-8, and claims 2, 8, 9, and 20 show that the steric group of the claimed invention can include at least an arylene group or at least an alkylene group. It is important for the Examiner to appreciate that there are two different types of groups attached onto the pigment of the claimed invention. (See the claims and page 5, lines 11-24, for instance, of the patent application) First, there is at least one steric group that is attached onto a pigment, and second, there is at least one organic ionic group and at least one amphiphilic counterion that are attached to the pigment.

Unlike the claimed invention, Adams et al. discloses only at least one organic group along with an amphiphilic ion attached to a carbon product. The amphiphilic ion of Adams et al. is not separately attached to the carbon product; it is associated with the organic group. Adams et al. does not teach or suggest separate steric groups and Adams et al. does not promote the steric hindrance that is associated with the steric group attached to the pigment of the claimed invention. As stated, Adams et al. only teaches the attachment of only one type of group, namely at least one organic group with an amphiphilic ion that has a charge opposite to the organic group. Thus, Adams et al. does not teach the additional steric group, which is also directly attached to a pigment as recited in the claims of the present application. Accordingly, the rejection under 35 U.S.C. § 102(b) should be withdrawn.

At page 2 of the Final Office Action, the Examiner rejects claims 29-31 under 35 U.S.C. §103(a) as being unpatentable over Adams et al. in view of Kato et al. (U.S. Patent No. 5,731,115). The Examiner maintains that Adams et al. discloses a carbon black with a polymeric cationic amphiphile and that Kato et al. discloses a preparation of a waterless lithographic printing plate by using a laser beam. The Examiner also maintains that Kato et al. discloses a photoconductive layer, which includes a substrate with a pre-coated layer and a charge-generating agent which includes organic pigments, such as a carbon black. Additionally, the Examiner maintains that in Kato et al., a solvent is used to remove portions from the imaged layer. In view of this, the Examiner concludes that if a person having an ordinary skill in the art had desired to improve the properties of the printing plate, it would have been obvious for the one skilled in the art to use the modified carbon black of Adams et al. with the polymeric cationic amphiphile in Kato et al.'s preparation of the waterless lithographic printing plate as an alternative to the ordinary carbon black. For the

following reasons, this rejection is respectfully traversed.

Claims 29-31 relate to printing plates or methods of imaging a lithographic printing plate. Each of these claims is directly or indirectly dependent on claim 1 in that the radiation absorptive layer is using the modified pigment of claim 1 of the present application. Adams et al. does not have an additional steric group and does not promote steric hindrance. Thus, Adams et al. does not teach or suggest the attachment of both 1) at least one steric group and 2) at least one organic ionic group with an amphiphilic counterion onto the pigment. Kato et al. does not overcome this deficiency. Thus, even if Adams et al. and Kato et al. were combined, the combination would not teach or suggest the claimed invention, since claims 29-31 are using the pigment of claim 1.

Further, Kato et al. relates to waterless lithographic printing plate and does not teach or suggest the use of a modified pigment, and certainly does not teach or suggest a pigment having attached at least one steric group and also at least one organic ionic group. Accordingly, the rejection under 35 U.S.C. § 103(a) over Adams et al. in view of Kato et al. should be withdrawn.

If there are any remaining questions, the Examiner is encouraged to contact the undersigned by telephone.

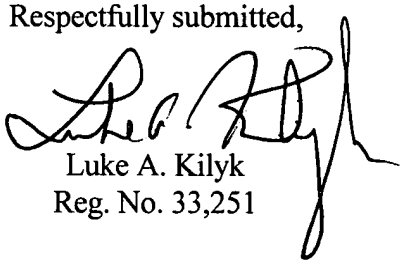
**CONCLUSION**

In view of the foregoing remarks, the Applicant respectfully requests the reconsideration of this application and the timely allowance of the pending claims.

If there are any other fees due in connection with the filing of this response, please charge the fees to Deposit Account No. 03-0060. If a fee is required for an extension of time under 37 C.F.R. § 1.136 not accounted for above, such extension is requested and should also be charged to

said Deposit Account.

Respectfully submitted,



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